

Exhibit

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

**WEST VIRGINIA RIVERS
COALITION, INC.,**

Plaintiff,

v.

Civil Action No. 2:24-CV-00701

THE CHEMOURS COMPANY FC, LLC,

Defendant.

DECLARATION OF MONTY FOWLER

I, Monty Fowler, state and affirm as follows:

1. I am a resident of Huntington, West Virginia, and have lived in Cabell County since August 1988. I intend to continue residing in Huntington for the foreseeable future.
2. From 2021 to the present, I have been a member of West Virginia Rivers Coalition.
3. West Virginia Rivers is a nonprofit organization incorporated in West Virginia. It has approximately 1,000 members. It works to promote the overall health of West Virginia's waters and their downstream benefits. It not only seeks preservation of high-quality waters but also the improvement of waters that should be of higher quality. West Virginia Rivers is dedicated to conserving and restoring West Virginia's exceptional rivers and streams.
4. Since August 1988, I have lived at residences in the Huntington area served by West Virginia American Water.
5. The intake for the water provided by West Virginia American Water to the Huntington area is on the Ohio River downstream of the Washington Works facility.

6. I am generally familiar with “PFAS,” which are forever chemicals that do not degrade in the environment and bioaccumulate.

7. I have been aware of Chemours’s contamination from Washington Works for several decades.

8. I am aware of Chemours’s Clean Water Act permit violations for PFOA and HFPO-DA at Washington Works.

9. I am aware that PFAS have been detected in the intake water for Huntington according to the USGS Scientific Investigations Report 2022–5067 “Occurrence of Per- and Polyfluoroalkyl Substances and Inorganic Analytes in Groundwater and Surface Water Used as Sources for Public Water Supply in West Virginia.”

10. I am also aware that Jeff Swertfeger from the Greater Cincinnati Water Works and Peter Goodmann of Louisville Water have provided declarations that show an increased level of HFPO-DA in their intake water in the Ohio River, which correlates to Chemours’s unlawful discharges of HFPO-DA from Washington Works.

11. Huntington is between Washington Works and Cincinnati and is also on the Ohio River.

12. I am aware that West Virginia American Water’s Huntington system is older and has had problems in the past with treating pollutants. I am concerned that American Water will not be able to consistently remove the PFAS from the source water before it comes to my tap.

13. I regularly consume tap water from my home in Huntington and have no treatment system installed to remove PFAS from the water.

14. Every time I drink water from my tap, I worry about the potential PFAS I am exposing myself to.

15. I also worry about my exposure to PFAS in the water when I shower and otherwise use tap water throughout my day.


16. My enjoyment of living in the Huntington area is diminished due to a fear of potential PFAS exposure.

17. I want to reduce my risk of exposure to PFAS as much as possible so as to have more peace of mind when I drink my tap water and am otherwise exposed to it.

18. If Chemours complied with its permit limits for PFOA and HFPO-DA at Washington Works, I would be less concerned about PFAS exposure in my tap water and my use and enjoyment of my water would increase.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 15 day of July, 2025.



Monty Fowler